

EXHIBIT B

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

CITADEL SECURITIES AMERICAS)
SERVICES LLC,)
Plaintiff,)
vs.) No 22CH-09197.
VINCENT PRIEUR,)
Defendant.)

**PLAINTIFF'S EMERGENCY MOTION
FOR TEMPORARY RESTRAINING ORDER**

Plaintiff Citadel Securities Americas Services LLC, an affiliate of the global Citadel Securities group of companies (“Citadel Securities”), pursuant to 735 ILCS 5/11-101, hereby moves this Court for a Temporary Restraining Order.

For the reasons stated in the Plaintiff’s Memorandum of Law in Support of this motion, Plaintiff respectfully requests for an order, in the form attached hereto, maintaining the *status quo* by enjoining Defendant Vincent Prieur from employment at Portofino Technologies.

Dated: September 16, 2022

Respectfully submitted,

CITADEL SECURITIES AMERICAS SERVICES
LLC

By: /s/ Adam L. Hoeflich

One of Its Attorneys

John Dickman
**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**
155 North Wacker Drive, Suite 4300
Chicago, Illinois 60606
(312) 558-1255
Firm ID No. 37976

Daniel D. Rubinstein
Christopher Y. Lee
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, Illinois 60603
(312) 853-7000
Firm ID No. 42418

Adam L. Hoeflich
BARTLIT BECK LLP
54 West Hubbard Street
Chicago, IL 60654
(312) 494-4400
Firm ID No. 31210

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Plaintiff, hereby certifies that he served a true and correct copy of the foregoing **Emergency Motion for Temporary Restraining Order**, on September 16, 2022 via email and overnight delivery to the following addresses:

v.n.prieur@gmail.com

91 Avenue Emile Zola
75015 Paris
France

45 W 69th St
Apt 6
New York, NY 10023
United States of America

By: /s/ Christopher Y. Lee
Christopher Y. Lee

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

CITADEL SECURITIES)
AMERICAS SERVICES LLC,)
Plaintiff,)
v.) Case No. 22CH-09197
VINCENT PRIEUR,)
Defendant.)

**ORDER GRANTING PLAINTIFF CITADEL SECURITIES AMERICAS SERVICES
LLC'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**

This matter having come before the Court on September 16, 2022, for the emergency motion of Plaintiff Citadel Securities Americas Services LLC, an affiliate of the global Citadel Securities group of companies (“Plaintiff”), for a Temporary Restraining Order, notice having been given to Defendant, a hearing having been held, and the Court being fully advised and with good cause:

1. Based on the evidence presented by Plaintiff, which consists of a Verified Complaint, this Court finds a substantial likelihood that Plaintiff will succeed on the merits of its cause of action. The evidence before the Court indicates that Defendant Vincent Prieur (“Defendant”) violated his non-compete agreement with Plaintiff by joining Portofino Technologies, a competitive enterprise to Plaintiff. If proven, this action will very likely result in a finding of liability against Defendant on Plaintiff’s claim.

2. The Court finds that Plaintiff lacks an adequate remedy at law and would suffer irreparable harm in the absence of a Temporary Restraining Order. Plaintiff has presented sufficient evidence to show that its confidential information, which it has invested hundreds of millions of dollars in developing and protecting, is at risk due to Defendant's actions and

threatened actions. In this situation, the threat of irreparable harm is significant.

3. The balance of harms weighs in favor of a Temporary Restraining Order. Plaintiff has shown a meaningful risk of irreparable harm.

4. The public interest is clearly served by granting a Temporary Restraining Order, as the public interest is served by the enforcement of the parties' valid non-compete agreement.

For the foregoing reasons, Plaintiff's Motion for a Temporary Restraining Order is granted and IT IS HEREBY ORDERED that:

(a) Defendant, within twenty-four (24) hours of the entry of this Order, must cease all employment with and services rendered for Portofino Technologies;

(b) Defendant shall preserve all documents (including electronically stored information), devices, equipment, and materials in whatever form that are or could be relevant to the allegations of the Verified Complaint;

(c) Defendant, within twenty-four (24) hours of the entry of this Order, shall provide to Plaintiff a declaration certifying his compliance with paragraphs (a) and (b) above;

(d) This order shall remain in effect until modified by the Court. A hearing is scheduled for _____, 2022.

Entered on this _____ day of September, 2022 Judge: _____

John Dickman
**OGLETREE, DEAKINS,
NASH, SMOAK &
STEWART, P.C.**
155 North Wacker Drive, Suite
4300
Chicago, Illinois 60606
(312) 558-1255
Firm ID No. 37978

Daniel D. Rubinstein
Christopher Y. Lee
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, Illinois 60603
(312) 853-7000
Firm ID No. 42418

Adam L. Hoeflich
BARTLIT BECK LLP
54 West Hubbard Street
Chicago, IL 60654
(312) 494-4400
Firm ID No. 31210

Attorneys for Plaintiff